

Robocall Mitigation Compliance with TRACED Act

Date	Contact/Title	Change Summary
February 19, 2026	Walter Carman, IT Manager	Update with clarifying language

This mitigation plan is submitted on behalf of Margaretville Telephone Company, an incumbent local exchange carrier, and its wholly owned affiliate, Catskills Communications, Inc. a competitive local exchange carrier. Margaretville Telephone Company and Catskills Communications, Inc. (collectively referred to as “MTC”) share operations, including their Robocall Mitigation Plan.

I. Implementation and Extension Status

Extensions Received Under 47 C.F.R. §64.6304

MTC is eligible for the continuing extension of the STIR SHAKEN implementation deadline as a small voice service provider (§64.6304 (a)(2) that has non-IP portions within its network §64.6304(d).

MTC is a member of NTCA who participates on the ATIS Non-IP taskforce working group which developed the (ATIS Solutions) non-IP call authentication solutions and serves as MTC’s third-party representative on the ATIS Non-IP taskforce working group

Status of STIR/SHAKEN Implementation

MTC has implemented the STIR/SHAKEN authentication framework on a portion of its network, and all calls it originates on that portion of its network are compliant with sections 64.6301(a)(1) and (2).

MTC has implemented authentication and verification of its traffic using the Metaswitch Call Guardian QCall STIR/SHAKEN Signing service for traffic that originates and terminates on the IP portions of the company’s network that support SIP calls.

MTC has implemented STIR/SHAKEN in parts of its network in which it may do so and has implemented this policy for those portions of its network not yet compliant.

II. Robocall Mitigation Plan

MTC is a voice service provider and all calls that originate on its network are subject to the company’s robocall mitigation plan. MTC uses Call Analytics to prevent the origination of robocall traffic on its network. All carriers to which MTC are connected appear on the Robocall Mitigation Database and their traffic is subject to the same mitigation plan as that of its own end users.

Call Analytics

MTC has implemented Metaswitch’s call guardian product with the TNS Call guardian authentication hub to perform automated monitoring of its network trunks. The monitoring system automatically flags spikes in calling volumes and call attestation reputation scores. Suspected calling is flagged to the central office personnel or can be queried without a flag. Following receipt of an alert, staff reviews the

source of traffic and historic calling patterns to eliminate known and expected volume increases (such as seasonality) to identify call patterns deemed suspicious.

Suspicious call patterns are reviewed by a designated employee and are addressed by a combination of implementation of real time monitoring, contacting the customer (including an in-person visit if warranted), to further review unusual calling patterns. If MTC cannot satisfactorily resolve the reason for the flagged traffic, or fails to get cooperation from the end user, it will implement mitigation activities including suspension / reduction / termination of service following reasonable notice.

Know Your Customer MTC serves primarily small business and residential users who are physically located within the MTC serving footprint. Any request for a large number of trunks is referred to our sales and outreach department for onboarding including validation of the nature of the business making the request.

General Prohibition Against Illegal Robocalling

MTC end user services are subject to restrictions contained in its published legal notices and all executed services orders include the requirement that service is provided pursuant to its terms of service (“TOS”) requirements.

Its existing TOS prohibit activities normally associated with Robocalling including, but not limited to:

- providing altered, deceptive, or false information about the identity of the sender or the origin of a message or phone call;
- violating any applicable local, state, or federal law; using the MTC service to engage in or in connection with fraudulent activities

The company has updated its TOS to expressly reference the prohibition on robocalling and all subscribers, receive notice of its updated TOS. MTC’s end users are notified that MTC may take action up to suspension or termination of service for violation of the TOS.

III. Traceback and Enforcement Cooperation

MTC will actively participate the traceback community including the FCC, law enforcement, and The Industry Traceback Group. The company commitments to respond within 24 hours to all traceback requests from the Commission, law enforcement, and the industry traceback consortium and will cooperate with such entities in investigating and stopping any illegal robocallers that use its service to originate calls.

IV. Additional Certifications

Neither MTC nor any entity with which it shares common ownership, management, directors, or control have been the subject of a formal Commission, law enforcement, or regulatory agency action or investigation with accompanying findings of actual or suspected wrongdoing due to the filing entity transmitting, encouraging, assisting, or otherwise facilitating illegal robocalls or spoofing, or a deficient Robocall Mitigation Database certification or mitigation program description.